

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

K.MIZRA LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No.: 6:20-cv-01031-ADA

**Jury Trial Demanded**

**JOINT REPORT ON OBJECTIONS TO  
WITNESSES, EXHIBITS, AND JURY CHARGE**

Plaintiff K.Mizra LLC (“K.Mizra”) and Defendant Cisco Systems, Inc. (“Cisco”) (collectively, the “Parties”) hereby submit this joint report on objections to the witness lists, exhibit lists, and jury instructions as included in the Parties’ Joint Pretrial Order (ECF No. 239). This joint report is filed pursuant to the Court’s Amended Standing Order on Pretrial Procedures and Requirements in Civil Cases dated May 23, 2023, which includes the following requirements:

- Within one week after the filing of the joint pretrial order, any objections to the proposed exhibits, witnesses, or jury charge shall be filed, as directed in the scheduling order (para. A.1);
- Within one week after the filing of the joint pretrial order, any objections to the proposed witnesses shall be filed as directed in the scheduling order (para. B.2.a); and
- Within one week after the filing of the joint pretrial order, any objections to the proposed jury charge shall be filed as directed in the scheduling order (para. C.1.f).

The Parties' objections to exhibit lists were filed on August 30. (*See* ECF No. 239, Exs. 4B (K.Mizra's initial exhibit list and Cisco's preliminary objections), 4C (K.Mizra's objections to Cisco's amended exhibit list).) The Parties intend to continue working together to narrow and/or resolve the remaining disputes, but do not have any further changes to those objections at this time.

The Parties' objections on witness lists were also filed on August 30. (*See* ECF No. 240-5 at 1–3 (Cisco's objections to K.Mizra's witness list), 240-6 at 5–12 (K.Mizra's objections to Cisco's preliminary and trial witness lists).) The Parties intend to continue working together to narrow and/or resolve the remaining disputes, but do not have any further changes to those objections at this time.

The Parties' initial objections on jury instructions were filed on August 30. (*See* ECF No. 240-9). A revised version of the proposed jury instructions, which reflect the Parties' continuing efforts to resolve and/or narrow the remaining disputes, is attached as Exhibit A. The Parties will also submit a revised Word version of these instructions to the Court via email. The Parties intend to continue working together to narrow and/or resolve the remaining disputes. The Parties mutually reserve all rights, and respectfully request the opportunity to respond to any jury charge provided by the Court before or during trial.

Dated: September 6, 2024

By: /s/ Robert R. Brunelli

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on September 6, 2024, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

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